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6 Attorney for ANDREW JOHN GIBSON

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ***

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANDREW JOHN GIBSON,

15 Defendant.
16

Case No, 2:14-cr-287-KJD-CWH

**UNOPPOSED MOTION TO MODIFY
PRETRIAL RELEASE**
(Expedited Consideration Requested)

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18 COMES NOW THE DEFENDANT by and through Rene L. Valladares, Federal Public
19 Defender, and Paul D. Riddle, Assistant Federal Public Defender, counsel for Andrew John
20 Gibson, and moves this court for an order modifying the defendants conditions to permit him
21 to visit with his parents when they travel to the Las Vegas area, so long as the Pretrial Services
22 Officer approves the locations visited and time frames Mr. Gibson will be away from the
23 Halfway House.

24 This motion is based on the following facts and all papers and pleadings previously filed
25 in this case.
26

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2 1. Undersigned defense counsel has contacted the AUSA Lisa Cartier-Giroux who
3 stated she is not opposed to the modification.

4 2. The defendant and his family respectfully submitted the proposed itinerary for
5 consideration with precise times and locations to be provided to the pretrial services officer:

6 Jan 25th (Monday) 5:30 pm pickup Dinner Outback Steakhouse

7 Jan 26th (Tuesday) 8:00 am pickup Breakfast Egg & I

8 Count's Kustoms

9 Jobs- resumes: Ford Engine Plant: SA Recycling; Vegas Recycling

10 2:00pm Barnes & Noble

11 4:00pm Mr Paul Riddle, Attorney meeting

12 Dinner House of Joy Chinese

13 Drop off by 9:00pm

14 DATED this 20th day of January, 2016.

15 Respectfully Submitted,

16 RENE L. VALLADARES
Federal Public Defender

17 */s/ Paul D. Riddle*

18 By _____

19 PAUL D. RIDDLE
Assistant Federal Public Defender
20 Counsel for ANDREW JOHN
GIBSON
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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6 ANDREW JOHN GIBSON,

7 DEFENDANT.
8
9

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ORDER

10 Based on the pending motion of counsel, and good cause appearing therefore, the Court
11 finds that the defendant pretrial release conditions can be modified to permit the defendant to
12 visit with his parents when they visit the Las Vegas area at various times and specific locations
13 pre-approved by his Pretrial Services Officer.

14 ORDER

15 IT IS THEREFORE ORDERED that the defendant be permitted time to visit with his
16 parents, both now and in the future, at various times and locations when they visit the Las Vegas
17 area, with prior approval from the Pretrial Services Officer as to the specific locations visited
18 and time frames Mr. Gibson will be away from the Halfway House.

19
20 DATED this 25th of January, 2016.

21 
22 _____
UNITES STATES MAGISTRATE JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on January 22, 2016, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY PRETRIAL RELEASE (Expedited Consideration Requested)** by electronic service (ECF) to the persons named below:

DANIEL G. BOGDEN
United States Attorney
LISA CARTIER-GIROUX
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/s/ Nancy Vasquez, Legal Assistant

Employee of the Federal Public Defender